

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE: TRIBUNE COMPANY Consolidated Multidistrict Litigation
FRAUDULENT CONVEYANCE : 11 MD 2296 (WHP)
LITIGATION : 12 MC 2296 (WHP)
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THIS DOCUMENT RELATES TO: :

ALL "NOTE HOLDER ACTIONS" :
(AS DEFINED IN MASTER CASE ORDER :
NO. 3, DATED SEPTEMBER 7, 2012) :
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NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law (the "Memorandum of Law"), Citadel Equity Fund Ltd., a Cayman Islands company, Camden Asset Management LP, and certain of their affiliates (referred to herein as the "Tendering PHONES Holders") will move this Court before the Honorable William H. Pauley III, United States District Court Judge, on March 1, 2013 at 11:00 a.m. ET in Courtroom 20B at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007 for an Order pursuant to Fed. R. Civ. P. 24(a)(2) and 24(b)(1)(B) permitting the Tendering PHONES Holders to intervene as plaintiffs in the above-captioned multi-district litigation (the "MDL") with respect to each of the "Note Holder Actions" (as defined in Master Case Order No. 3 entered by this Court on September 7, 2012).

PLEASE TAKE FURTHER NOTICE that, pursuant to the Scheduling Order entered by the Court on January 29, 2013, oppositions to the Motion, if any, are required to be filed and served upon the undersigned no later than February 15, 2013.

Dated: January 29, 2013
New York, New York

ANDREWS KURTH LLP

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